

EXHIBIT

A



Clerk Of The Circuit Court
Courthouse
Upper Marlboro, Md. 20772-9987
MD Relay Service Voice/ TDD
1-800-735-2258

Rec'd 6-4-19 (LT)
Cert. Mail

Case No.: CAL19-13733

Other Reference No.(s):

Child Support Enforcement Number:

Date issued: May 1, 2019

To: Washington Metropolitan Area Transit Authority
SV: Patricia Lee
600 5th Street, NW
Washington, DC 20001

WRIT OF SUMMONS

You are hereby summoned to file a written response by pleading or motion, within 60 days after service of this summons upon you, in this Court, to the attached complaint filed by;

MELVIN MARCH
4374 EAGLE COURT
WALDORF MD 20603

This summons is effective for service only if served within 60 days after the date it is issued.

Mahasin El Amin
Clerk of the Circuit Court #58

To the person summoned:

Failure to file a response within the time allowed may result in a judgment by default or the granting of the relief sought against you.

Personal attendance in court on the day named is NOT required.

Proper Courtroom attire is expected. Anything that you would wear to an office that presents a professional appearance is appropriate. Please no shorts, cut-off jeans, halter, tank or tube tops or other attire that reveals the abdomen or lower back, spandex or mesh garments.

Instructions for Service:

1. This summons is effective for service only if served within 60 days after the date issued.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Maryland Rule 2-126.
4. If this notice is served by private process, process server shall file a separate affidavit as required by Maryland Rule 2-126(a).

SHERIFF'S RETURN

Circuit Court for Prince George's County

To:.....

Sheriff fee:..... By:.....

Served:..... Time:

..... Date:.....

Unserved (Reason):.....

Instructions to Private Process:

1. This Summons is effective for service only if served within 60 days after the date issued.
2. Proof of Service shall set out the name of the person served, date and the particular place and manner of service. If service is not made, please state the reasons.
3. Return of served or unserved process shall be made promptly and in accordance with Rule 2-126.
4. If this summons is served by private process, process server shall file a separate affidavit as required by Rule 2-126(a).

IN THE CIRCUIT COURT FOR Prince George's County

(City or County)

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT**DIRECTIONS**

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: <input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT		CASE NUMBER _____
CASE NAME: <u>Melvin March</u>		vs. <u>Washington Metropolitan Area Transit Authority, et. al.</u>
PARTY'S NAME: <u>Melvin March</u>		
PARTY'S ADDRESS: <u>4374 Eagle Court, Waldorf, MD 20603</u>		PHONE: <u>301-765-0076</u>
PARTY'S E-MAIL: <u>zmyers@fminjury.com</u>		
If represented by an attorney:		
PARTY'S ATTORNEY'S NAME: <u>Zachary S. Myers, Esq.</u>		PHONE: <u>301-765-0076</u>
PARTY'S ATTORNEY'S ADDRESS: <u>9241 Cambridge Manor Court, Potomac, MD 20854</u>		
PARTY'S ATTORNEY'S E-MAIL: <u>zmyers@fminjury.com</u>		
JURY DEMAND? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
RELATED CASE PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, Case #(s), if known: _____
ANTICIPATED LENGTH OF TRIAL: _____ hours or <u>2-3</u> days		

PLEADING TYPE

New Case: ☒ Original ☐ Administrative Appeal ☐ Appeal
 Existing Case: ☐ Post-Judgment ☐ Amendment
 If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

TORTS <input type="checkbox"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input checked="" type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death CONTRACT <input type="checkbox"/> Asbestos <input type="checkbox"/> Breach <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Confessed Judgment (Cont'd) <input type="checkbox"/> Construction <input type="checkbox"/> Debt <input type="checkbox"/> Fraud	<input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability PROPERTY <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Ownership <input type="checkbox"/> Partition/Sale in Lieu <input type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over	PUBLIC LAW <input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mncpl Code/Ord <input type="checkbox"/> Election Law <input type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari EMPLOYMENT <input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLSA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination INDEPENDENT PROCEEDINGS <input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance	<input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Atty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel PEACE ORDER <input type="checkbox"/> Peace Order EQUITY <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus OTHER <input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements
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IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input checked="" type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input checked="" type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input checked="" type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- ☐ Liability is conceded. ☐ Liability is not conceded, but is not seriously in dispute. ☒ Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- ☐ Under \$10,000 ☐ \$10,000 - \$30,000 ☐ \$30,000 - \$100,000 ☒ Over \$100,000

- ☒ Medical Bills \$ 12,000 approx ☒ Wage Loss \$ 8,000 approx ☐ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)

- A. Mediation ☒ Yes ☐ No C. Settlement Conference ☒ Yes ☐ No
B. Arbitration ☐ Yes ☒ No D. Neutral Evaluation ☐ Yes ☒ No

SPECIAL REQUIREMENTS

- ☐ If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
☐ If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.

(Case will be tracked accordingly)

- ☐ 1/2 day of trial or less ☐ 3 days of trial time
☐ 1 day of trial time ☐ More than 3 days of trial time
☒ 2 days of trial time

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- ☐ **Expedited**- Trial within 7 months of Defendant's response ☐ **Standard** - Trial within 18 months of Defendant's response

EMERGENCY RELIEF REQUESTED

COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE MANAGEMENT PROGRAM (ASTAR)	
<p><i>FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.</i></p> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response </div> <div style="text-align: center;"> <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response </div> </div>	
<p>IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.</p>	
CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)	
<input type="checkbox"/> Expedited <input type="checkbox"/> Civil-Short <input type="checkbox"/> Civil-Standard <input type="checkbox"/> Custom <input type="checkbox"/> Asbestos <input type="checkbox"/> Lead Paint <input type="checkbox"/> Tax Sale Foreclosures <input type="checkbox"/> Mortgage Foreclosures	Trial 60 to 120 days from notice. Non-jury matters. Trial 210 days from first answer. Trial 360 days from first answer. Scheduling order entered by individual judge. Special scheduling order. Fill in: Birth Date of youngest plaintiff _____ Special scheduling order. No scheduling order.
CIRCUIT COURT FOR BALTIMORE COUNTY	
<input type="checkbox"/> Expedited (Trial Date-90 days) <input type="checkbox"/> Standard (Trial Date-240 days) <input type="checkbox"/> Extended Standard (Trial Date-345 days) <input type="checkbox"/> Complex (Trial Date-450 days)	Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus. Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases. Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency. Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

4/17/2019
 Date
 9241 Cambridge Manor Court
 Address
 Potomac, MD 20854
 City, State, Zip

Signature of Counsel / Party
Zachary S. Myers, Esq.
 Printed Name

CPF# 1112140289

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND
Civil Division

Melvin March
4374 Eagle Court
Waldorf, MD 20603

Plaintiff

vs.

**Washington Metropolitan Area
Transit Authority**
600 5th Street, NW
Washington, DC 20001

Serve: Patricia Lee, General Counsel
600 5th Street, NW
Washington, DC 20001

and

Raneshia Shernette Allen
2649 Martin Luther King Avenue SE, #201
Washington, DC 20020

Defendants.

Civil Action No. _____

2019 APR 19 PM 1:28
CLERK OF THE
CIRCUIT COURT
PRINCE GEORGE MD #14

COMPLAINT

1. This Court has jurisdiction because the subject matter automobile collision occurred in Prince George's County, Maryland.
2. Plaintiff Melvin March (hereinafter "March") is an adult individual who resides in Waldorf, Maryland.
3. Defendant Washington Metropolitan Area Transit Authority (hereinafter "WMATA") is an organization which regularly conducts business in The State of Maryland and in Prince George's County.
4. Defendant Raneshia Shernette Allen (hereinafter "Allen") is an adult individual who resides in the District of Columbia.

5. On or about July 1, 2017 at approximately 5:00 p.m., Plaintiff was operating a motor vehicle which was stopped on Indian Head Hwy at or near the intersection with Old Ford Road due to a red traffic light signal.
6. At the aforementioned time and place, Defendant Allen was operating a vehicle owned by Defendant WMATA as their agent, servant and/or employee, with permission to use the vehicle, and was behind the Plaintiff's vehicle when Defendant Allen caused a collision by striking Plaintiff's vehicle when she prematurely moved the vehicle when the traffic light ahead turned green.
7. At that time and place, Defendant Allen had express and or implied permission to use the vehicle within the scope of her employment or as an agent, servant, joint venturer, or employee of Defendant WMATA.
8. Defendant Allen breached the duties of care owed to Plaintiff March.
9. As a direct and proximate result of the Defendant's negligence and breach of duties, Plaintiffs suffered bodily injuries, sustained pain and discomfort, incurred medical expenses, property damage and lost income.

COUNT I: NEGLIGENCE
(PLAINTIFF MARCH AGAINST DEFENDANT ALLEN)

10. Paragraphs 1-9 are hereby incorporated by reference and realleged as if fully restated herein.
11. Defendant Allen owed Plaintiff March numerous duties including, but not limited to the following: to maintain control of her vehicle, to yield right of way, to avoid a collision, to obey traffic signs and controls, to obey the rules of the road, to keep a proper lookout, to pay full-time and attention to her driving, to leave a proper

distance, to drive at a reasonable speed under the circumstances, to obey traffic control devices, and to not cause a collision.

12. Defendant Allen breached the duties owed to Plaintiff and caused the collision.
13. As a direct and proximate result of Defendant Allen's breach of duties, Plaintiff suffered bodily injuries, sustained pain and discomfort, incurred medical expenses, and lost income.

WHEREFORE, Plaintiff March demands judgment against Defendant Allen in and amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus interest and costs.

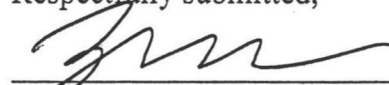
COUNT II: RESPONDEAT SUPERIOR/ VICARIOUS LIABILITY
(PLAINTIFF MARCH AGAINST DEFENDANT WMATA)

14. Paragraphs 1-13 are hereby incorporated by reference and realleged as if fully restated herein.
15. Defendant Allen was operating a vehicle owned by Defendant WMATA and with their permission and/or at their direction and/or as their agent, servant or employee.
16. At all times relevant herein, Defendant WMATA through its employee, agent and servant, Defendant Allen, was negligent in the operation of the Defendant's vehicle as set forth above.
17. As a direct and proximate result of the negligence of Defendant Allen, Defendant WMATA's employee, agent and servant, the collision occurred and Plaintiff sustained bodily injuries, sustained pain and discomfort, incurred medical expenses, and lost income.

18. Defendant WMATA is vicariously liable for the actions or omissions of Defendant Allen and/or liable under a doctrine of respondeat superior.

WHEREFORE, Plaintiff March demands judgment against Defendant WMATA in and amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) plus interest and costs.

Respectfully submitted,



Zachary S. Myers, Esq. CPF # 1112140289
Judy L. Feinberg, Esq. CPF # 8506010092
Feinberg Myers, P.C.
9241 Cambridge Manor Court
Potomac, MD 20854
301-765-0076
Attorney for Plaintiff

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature X <i>Elizabeth E. Tapp</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Washington Metropolitan Area Transit Authority SV: Patricia Lee 600 5th Street, N.W. Washington, DC. 20001</p>		<p>B. Received by (Printed Name) ELIZABETH E. TAPP</p> <p>C. Date of Delivery 6.4.19</p>	
<p>2. Article Number (Transfer from service label) 7016 0340 0000 9920 7095</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

USPS TRACKING#

9590 9402 1929 6123 9810 36

United States Postal Service

First-Class Mail
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USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box •

**Feinberg Myers, PC
9241 Cambridge Manor CT
Potomac, MD 20854**

Melvin March